

COMPLAINT

EXHIBIT B

Fleming, Timothy

From: Burbage, James
Sent: Monday, April 15, 2019 5:18 PM
To: Hanrahan, Andrew; Fleming, Timothy
Subject: Fwd: More Evidence re Ex Parte Camp

James H. Burbage
Willkie Farr & Gallagher LLP
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Begin forwarded message:

From: "Feldman, Matthew" <mfeldman@willkie.com>
Date: April 15, 2019 at 5:14:37 PM EDT
To: "Burbage, James" <JBurbage@willkie.com>, "McCallen, Benjamin" <BMcCallen@willkie.com>
Subject: FW: More Evidence re Ex Parte Camp

Matthew A. Feldman
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From: Craig Simon [<mailto:cjsimon@bergerkahn.com>]
Sent: Monday, April 15, 2019 5:14 PM
To: Feldman, Matthew <mfeldman@willkie.com>; Minias, Joseph <jminias@willkie.com>; Forman, Daniel <DForman@willkie.com>; Kathryn Diemer <kdiemer@diemerwei.com>
Cc: Pickett, Waylon <wpickett@ghlaw-llp.com>; Mark Grotefeld <mgrotefeld@ghlaw-llp.com>; Shawn Caine <scaine@cainelaw.com>; Regan, Tom <TRegan@cozen.com>; Kevin Bush <kbush@cozen.com>; Ochoa, Maura <mochoa@ghlaw-llp.com>; Howard Maycon <hmaycon@cozen.com>
Subject: More Evidence re Ex Parte Camp

From: "Noel, Marc" <MNoel@buttecounty.net>
Date: April 15, 2019 at 1:34:35 PM PDT
To: 'Steve Campora' <scampora@dbbwc.com>
Cc: "Ramsey, Mike" <MRamsey@buttecounty.net>
Subject: RE: Camp Fire

I haven't consulted PG&E.
I was surprised that PG&E attorneys notified you.

We cannot accommodate your request because we do not have the time or the resources to set it up. You have to remember that ours is a criminal investigation. The evidence that you want to view was seized as evidence in a criminal investigation. In order to maintain the integrity of the evidence and the chain of custody we must follow established protocols, including security. We do not have the additional security manpower available.

From: Steve Campora <scampora@dbbwc.com>

Sent: Monday, April 15, 2019 12:53 PM

To: Noel, Marc <MNoel@buttecounty.net>

Cc: Frank Pitre <FPitre@cpmlegal.com>; Ramsey, Mike <MRamsey@buttecounty.net>

Subject: Re: Camp Fire

We got 2 days notice of this. The civil case is stayed by the bankruptcy.

Who is saying we cannot attend, PG&E?

Sent from my iPhone

On Apr 15, 2019, at 12:46 PM, Noel, Marc <MNoel@buttecounty.net> wrote:

I know very little about civil discovery. I was under the impression that there was some type of info sharing order.

I apologize that we cannot accommodate your request. After the evidence is returned from the lab we will try to set up an evidence view for you and your experts.

From: Steve Campora <scampora@dbbwc.com>

Sent: Monday, April 15, 2019 12:36 PM

To: Noel, Marc <MNoel@buttecounty.net>

Cc: Frank Pitre <FPitre@cpmlegal.com>; Ramsey, Mike <MRamsey@buttecounty.net>

Subject: Re: Camp Fire

There are no such orders. We are stayed. They will claim work product.

Sent from my iPhone

On Apr 15, 2019, at 12:20 PM, Noel, Marc <MNoel@buttecounty.net> wrote:

Steve –

After speaking w/ our people it is not going to be possible for you and your experts to attend.

It is my understanding that PG&E will be laser scanning the collected transposition hardware. I believe PG&E will be sharing the laser scan data with you pursuant to the civil discovery orders.

Sorry, Marc

From: Steve Campora <scampora@dbbwc.com>

Sent: Monday, April 15, 2019 11:51 AM

To: Noel, Marc <MNoel@buttecounty.net>

Cc: Frank Pitre <FPitre@cpmlegal.com>

Subject: Re: Camp Fire

I would like to have 3 people. Myself and two experts.

Sent from my iPhone

On Apr 15, 2019, at 11:12 AM, Noel, Marc <MNoel@buttecounty.net> wrote:

When you say “we” who do you mean? Let me know how many people and who they are and I will discuss w/ the security people.

From: Steve Campora <scampora@dbbwc.com>
Sent: Monday, April 15, 2019 10:04 AM
To: Noel, Marc <MNoel@buttecounty.net>
Cc: Frank Pitre <FPitre@cpmlegal.com>
Subject: Re: Camp Fire

So are we able or unable to attend?

Sent from my iPhone

On Apr 15, 2019, at 9:34 AM, Noel, Marc <MNoel@buttecounty.net> wrote:

PG&E attorneys requested to view and laser scan all of the transposition hardware that we have collected prior to transport to Washington D.C. That viewing will take place on Wed.

PG&E have already photographed and extensively documented all of the transposition hardware we have collected. One of the most frustrating areas of this investigation is that we have to rely upon PG&E to assist w/ the removal and collection of evidence. We have been unable to find any other company that has the training, experience and equipment necessary to remove parts off of transmission towers that is willing to do the job.

The evidence view on Wed was negotiated by PG&E’s attorneys as part of the removal agreement.

From: Steve Campora
<scampora@dbbwc.com>
Sent: Monday, April 15, 2019 9:20 AM

To: Noel, Marc
<MNoel@buttecounty.net>

Subject: Re: Camp Fire

PG&E has advised that they will be there to observe removal and will be allowed to view the hook in question. Is that correct? If so, will Plaintiffs be allowed to observe?

Sent from my iPhone

On Apr 15, 2019, at 9:18 AM, Noel, Marc <MNoel@buttecounty.net> wrote:

Not for any of the testing or analysis.

From: Steve Campora
<scampora@dbbwc.com>

Sent: Monday, April 15, 2019 9:10 AM

To: Noel, Marc
<MNoel@buttecounty.net>

Cc: Frank Pitre
<FPitre@cpmlegal.com>
>

Subject: Re: Camp Fire

Is it correct that PG&E will be present?

Sent from my iPhone

On Apr 15, 2019, at 8:39 AM, Noel, Marc <MNoel@buttecounty.net> wrote:

Steve –
All of
our
forensic work
is
being
done
by the
FBI

Nat'l
Lab.
You
definit
ely
will
not be
able to
send
your
experts
to
observ
e. Wh
en the
case is
over
we
might
release
the
results
but the
experts
will
not be
availab
le for
consult
ation
or
testimo
ny.
Marc

From: Steve
Campora
<scampora@dbbwc.com>

Sent: Monday,
April
15,
2019
8:11
AM
To: Noe

I, Marc
<MNoel@buttecounty.net>

Cc: Frank Pitre
<FPitre@cpml.egal.co.m>

Subject

: Re:
Camp
Fire

Marc,

I
received a
lengthy
email
from
Kevin
Orsini
regarding
testing
on the
transmission
line
hardware,
including the
failed C
hook. Email
was a
little
vague
on
timing
of
testing
results
and
release
of
equipment

ent
after
testing.

After
your
investig
ation is
comple
te, will
we
have
access
to
results?

Can we
send
our
own
experts
to
observe
?

Please
let me
know.

Steve
Campor
a

Sent
from
my
iPhone

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